

### Policy Statement

The Wise Recruitment Group (incorporating Wise Employment and Smart Recruitment) commits to developing and adopting a proactive approach to identifying Modern Slavery and Hidden Labour exploitation which includes human trafficking, forced labour, debt-bonded labour and similar human rights abuses and is committed to ensuring that its staff and any workers it supplies are not subject to behaviour or threats that may amount to modern slavery or hidden labour exploitation.

**Modern slavery** is a broad term used to encompass offences that involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

**Hidden labour exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

**Forced labour** is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

**Debt-bonded labour** is where a person's labour is demanded as a means of repayment for a loan or service.

**Human trafficking** is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

### Scope

This policy applies to all The Wise Recruitment Group branches and members of staff.

### Responsibility

The overall responsibility for ensuring the implementation, monitoring and communication of this policy lies with Keith Robinson, Managing Director.

Joanne Fisher, Administration Manager or Iza Kleszczewska, Resourcing Supervisor have responsibility for dealing with any report or suspicion of worker exploitation or modern slavery.

Reports surrounding these issues are taken extremely seriously by our board of directors, who are committed to ensuring that actions shall be taken promptly and appropriately. If our actions and any investigations reveal issues, we are committed to taking appropriate action, including but not limited to:

- Removing organisations from our client or supplier listing
- Passing details to appropriate law enforcement bodies
- Taking disciplinary action as appropriate

### Policy Commitments

The Wise Recruitment Group shall:

1. Designate Joanne Fisher as the appropriate manager to have responsibility for developing and operating company procedures relevant to this subject.
2. Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around labour exploitation and signs to look for, and are able to report and deal with any concerns appropriately.
3. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
4. Provide information on tackling "Hidden Labour Exploitation" to our workforce through interviews, workplace posters, worker leaflets, induction and handbooks.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the appropriate investigation and enforcement authority.
6. Positively encourage and support employees and agency workers to report such cases of Hidden Labour Exploitation or Human Trafficking; whether they themselves or a member of the community is subject to exploitation which may be occurring.
7. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.
8. Ensure that all employees will be made aware that failure to comply with this policy may result in disciplinary action up to and including dismissal; in line with the Company Disciplinary Policy.

### Monitoring

We regularly monitor our performance in this area through the use of relevant key performance indicators, including:

- Our Complaints Policy
- Our Internal and External Audit Programme
- The level of modern slavery training and awareness amongst our staff.

We would recommend reading this in conjunction with our Ethical Policy and Equal Opportunities and Diversity Policy.

This Policy will be reviewed annually.

A handwritten signature in black ink, appearing to read "Keith Robinson".

**Keith Robinson, Managing Director, January 2024**